

Exhibit V

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF BIDIAWATTIE TEWARI

I, Bidiawattie Tewari, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in Tower Two of the World Trade Center when the 9-11 terrorist attacks of the World Trade Center Towers occurred.

4. At the time of these horrific terrorist attacks, I was employed as a clerk at Fiduciary Trust and International Company.

5. I was at work on the 97th Floor of Tower Two when a passenger jet, hijacked and piloted by terrorists, plunged into our Tower and tore through the entire width of the building, detonating destruction, mayhem and unspeakable carnage that would endure for almost 2 hours without pause—and in the horrific memories of survivors like me, for a lifetime.

6. When the planes hit the World Trade Center Towers, my coworkers and I fled our offices. While I was attempting to escape from the 97th Floor, I fell down a flight of stairs and suffered injuries to both my shoulders, right elbow, and lower back. I inhaled significant levels of smoke and other debris.

7. Because of the atrocities occurring in World Trade Center Tower One on September 11, 2001, I suffered the following specific physical injuries: sprained shoulders, a sprained right elbow, sprained hands, herniated discs in my lower back, and later developed asthma and sinusitis. An MRI of my lumbar spine on December 6, 2001, showed a left lateral herniation at L3-4 disc spacing extending into left neural foramen causing neural foraminal encroachment; the MRI also revealed a diffuse disc bulge at L4-5 disc space. A subsequent MRI of my cervical spine on December 5, 2002 showed straightening of the normal cervical lordosis, spondylosis at C6-7, and thickening of the posterior spinal ligament at C6-7. Lastly, an MRI of my right shoulder on December 5, 2002, showed bicep tendonitis as well as thickening and a partial tear of my supraspinatus tendon. I had multiple sessions of physical therapy and chiropractic care to address the above injuries in the weeks and months following the 9-11 attacks. Further, due to the incredible amounts of dust and debris that I inhaled at Ground Zero on 9-11, my doctors also diagnosed me with both asthma and sinusitis. I received treatment for these conditions after 9-11, and I continue to receive treatment for these medical conditions presently as well.

8. Because of these terrorist attacks, I have been disabled and unable to work since September 11, 2001. Although I attempted to work after 9-11, I was unable to continue working due to my continuing physical pain.

9. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was

going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

10. Attached as Exhibit B to this Declaration are true and correct copies of my select relevant medical records related to the treatment that I received following these horrific terrorist attacks.

11. I previously pursued a claim through the September 11th Victim Compensation Fund specifically related to my injuries incurred on September 11, 2001, and my claim was determined

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 9 day of December 2019.


Name of Affiant Bidiawattie Tewari

Exhibits Filed Under Seal